## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON PORTLAND DIVISION

DRY BULK SINGAPORE PTE. LTD,

Plaintiff,

v.

Amis Integrity S.A., *in personam* and M/V AMIS INTEGRITY (IMO 9732412) her engines, freights, apparel, appurtenances, tackle, etc., *in rem*,

Defendants.

Case No. 3:19-cv-1671

IN ADMIRALTY

DECLARATION OF MICHAEL NOLAN Q.C. IN SUPPORT OF EMERGENCY MOTION TO VACATE ARREST AND FOR ATTORNEYS' FEES, COSTS, AND EXPENSES FOR WRONGFUL ARREST; AND REQUEST FOR EXPEDITED HEARING

## I, MICHAEL NOLAN, Q.C., declares as follows:

- 1. I am over the age of majority and, except as otherwise indicated, make this declaration on personal knowledge, and am competent to testify regarding the facts contained herein.
- 2. I am a self-employed Queen's Counsel, practising from Quadrant Chambers, 10 Fleet Street, London EC4Y 1AU. I have been in practice as a barrister, specialising in DECLARATION OF M. NOLAN Q.C. Page 1 [Case No. 3:19-cv-1671]

commercial law with a particular emphasis on shipping and commodities, since 1983, having

been called to the Bar in 1981. I appear regularly in London arbitrations (especially those

conducted under the auspices of the London Maritime Arbitrators' Association of which I am

a supporting member) and in the Commercial and Admiralty Courts and the Court of Appeal

in London. I also occasionally act as an arbitrator, usually in the field of maritime law.

3. I was asked by the North of England P& I Association, to prepare the Opinion

attached hereto as Exhibit 1.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE

STATE OF OREGON AND THE UNITED STATES OF AMERICA THAT THE

FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND

BELIEF.

DATED this 18th day of October, 2019 at London, United Kingdom.

MICHAEL NOLAN O.C.

DECLARATION OF M. NOLAN Q.C. - Page 2